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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$60,000.00 IN U.S.
CURRENCY,

15 APPROXIMATELY \$10,000.00 IN U.S.
16 CURRENCY, and

17 ASSORTED MONEY ORDERS VALUED AT
\$4,000.00 IN U.S. CURRENCY,

18 Defendants.
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CASE NO. 1:21-MC-00001-AWI

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimants
21 Albert Corona and Coalinga Auto & Truck Diesel Repair (“claimants”), by and through their respective
22 counsel, as follows:

23 1. On or about October 13, 2020, claimants filed a claim in the administrative forfeiture
24 proceeding with the Drug Enforcement Administration with respect to Approximately \$60,000.00 in
25 U.S. Currency, Approximately \$10,000.00 in U.S. Currency, and Assorted Money Orders valued at
26 \$4,000.00 in U.S. Currency, which were seized on July 10, 2020 and July 23, 2020, (hereafter
27 collectively “defendant funds”).
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1 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
2 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
3 person to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
4 than claimants has filed a claim to the defendant funds as required by law in the administrative forfeiture
5 proceeding.

6 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
7 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds
8 are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
9 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
10 That deadline is January 11, 2021.

11 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
12 March 12, 2021, the time in which the United States is required to file a civil complaint forfeiture
13 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject
14 to forfeiture.

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5. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture shall be extended to March 12, 2021.

Dated: January 8, 2021

McGREGOR W. SCOTT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: January 8, 2021

By: /s/ Arturo Hernandez
ARTURO HERNANDEZ
 Attorney for Potential Claimants
 Albert Corona and Coalinga Auto &
 Truck Diesel Repair
 (Signature authorized by phone)

IT IS SO ORDERED.

Dated: January 11, 2021

~~SENIOR DISTRICT JUDGE~~